

## **EXHIBIT 10**

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**DECLARATION OF WASHOE COUNTY LIBRARY SYSTEM**  
**DIRECTOR JEFF SCOTT**  
**IN SUPPORT OF DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

STATE OF NEVADA

COUNTY OF WASHOE

I, Jeff Scott do hereby declare, under penalty of perjury, the following:

1. I am the Washoe County Library System Director based in Reno, Nevada. I am one of the named defendants in *Ribar v. Washoe County, NV*, District of Nevada case number 3:24-cv-0052-ART-CSD. I am being represented by the Washoe County District Attorney's Office.

2. On August 9, 2024, as the proper second level for appeal, I reviewed and upheld the one-year Washoe County Library system suspension issued on June 14, 2024, for Plaintiff Drew Ribar ("Mr. Ribar").

3. Mr. Ribar owns and operates a public YouTube channel called Auditing Reno 911. On this YouTube channel, Mr. Ribar posts edited videos, or videos with his commentary wherein I have been personally named, featured, and harassed.

4. Mr. Ribar's YouTube channel and videos regarding me appear to unjustly depict me as a bully and violent person. Namely, Mr. Ribar continues to assert throughout his videos that I assaulted him. These videos include titles include, but are not limited to:

- a. "Assault and Trespass the camera man at Washoe County Library Drag Queen Story Hour Inclusiveness"<sup>1</sup> (I am shown numerous times interacting with Mr. Ribar in the video, with the caption on the video entitled "Library Director Jeff Scott Assault and Trespass Man with camera");

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<sup>1</sup> <https://www.youtube.com/watch?v=QqqriwEc3y8>

- b. “Washoe County Library Director Jeff Scott decides who is entitled to speak and who shall be BLOCKED!”<sup>2</sup> (the video title implies that I regularly prohibit library visitors from speaking, which is false, shows my interactions with Mr. Ribar and includes my salary);
- c. “Pompous Library Director Chastises Board of Trustees”<sup>3</sup> (video negatively depicts my interactions with the Washoe County Library Board of Trustees);
- d. Library Gets Sued for Discrimination”<sup>4</sup> (video discusses has a misleading title, but discusses the instant case, and video description invites viewers to contact the Board of Trustees if they believe I should be fired);
- e. “Accused Battery in the Library: Jeff Scott Exposed!”<sup>5</sup>
- f. “Sheriff, Will Jeff Scott be Investigated?”<sup>6</sup> (implying that I engaged in a criminal act warranting law enforcement investigation); and
- g. Several other videos containing my photograph as the thumbnail and depicting my staff and library branches in an unwarranted oppressive manner.

5. Mr. Ribar’s YouTube videos have destructively impacted my relationships with the community as Washoe County Library Director, affecting me not only personally and professionally, but also detrimentally affecting my relationship with the Washoe County Library Board of Trustees and its members.

6. Mr. Ribar’s incessant YouTube video and social media harassment campaign has led to a more hostile Washoe County Library Board of Trustees and has created a negative work environment for me. Any person with internet access can locate and simply view the misleading video titles which would reasonably form an opinion that I am violent, a

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<sup>2</sup> <https://www.youtube.com/watch?v=4kUaxwtxKRg>

<sup>3</sup> [https://www.youtube.com/watch?v=x\\_9cPu3VHCs](https://www.youtube.com/watch?v=x_9cPu3VHCs)

<sup>4</sup> [https://www.youtube.com/watch?v=y0P6b\\_wBUdc](https://www.youtube.com/watch?v=y0P6b_wBUdc)

<sup>5</sup> <https://www.youtube.com/watch?v=xSjPf2xP7so>

1 criminal, and/or discriminative. The videos themselves are edited to show only Mr. Ribar's  
2 perspective and his commentary on what occurred, furthering the misleading nature of the  
3 videos.

4 7. I am allowing Mr. Ribar to depose me only because the law mandates it. I would  
5 not otherwise choose to interact with Mr. Ribar, and thereby provide him with potential  
6 video content for further harassment. I am concerned that Mr. Ribar will use discovery  
7 materials, including videos of depositions, in an abusive manner by posting clips to  
8 YouTube and inviting further embarrassment, harassment, and/or oppression on me and  
9 my staff who are subject to depositions.

10 I declare under penalty of perjury that the foregoing is true and correct.

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<sup>6</sup> <https://www.youtube.com/watch?v=ImPacyQDcY>